

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 4:14 CR 246 AGF (NAB)
THOMAS GREGORY ANDERSON, JR. et al,)	
)	
Defendants.)	

**GOVERNMENT'S MOTION FOR PRETRIAL DETERMINATION OF
ADMISSIBILITY OF ARGUABLY SUPPRESSIBLE EVIDENCE AND
DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and John T Davis, Assistant United States Attorney for said District, and makes the following disclosures pursuant to Federal Rule of Criminal Procedure 12(b)(4):

At trial, the Government intends to use the evidence seized and statements made by the defendants during the events described below. This evidence and these statements are more fully set forth in investigative reports and computer discs which, if not provided previously, will be made available to defendants.

The Government has listed all of the defendants that it believes could possibly argue standing to contest each matter, although the Government is in no way conceding that these individuals, in fact, have standing on these events. Furthermore, the fact that certain defendants are listed as associated with each event would not preclude any other defendant from claiming standing.

In connection with this filing, the Government moves for pretrial determination of admissibility of arguably suppressible evidence.¹

The Government has not included in its listing of events the various surveillance that occurred during the course of the investigation, nor the obtaining of "booking" information. It is the Government's position that these events are not subject to suppression.

DATE	EVENT/ITEM	DEFENDANT(S)	WITNESS
Oct. 26, 2012	Pen Register (314) 306-3627	Brian Hounsom Brian Lord	DEA SA Brandon Moles
June 19, 2013	Pen Register (925) 337-3695	Thomas Anderson Travis Champ	DEA SA Brandon Moles
Aug. 16, 2013	Pen Register (573) 424-4464	Brian Lord	DEA SA Brandon Moles
Aug. 16, 2013	PLI Order (530) 949-3872	Thomas Anderson Bryan Brandt	DEA SA Brandon Moles
April 6, 2012	PLI Order (573) 424-4464	Brian Lord	DEA SA Brandon Moles
Nov. 13, 2012	Search warrant: 4749 East Concord Road St. Louis, MO	Thomas Anderson	DEA SA Brandon Moles
Nov. 13, 2012	Search warrant: 67 Blackthorn Dr. St. Louis, MO	Brian Hounsom	DEA SA Brandon Moles
March 7, 2013	Search warrant: 652 Emerson Dr. St. Louis, MO	David Dodge	DEA SA Brandon Moles
June 27, 2012	Title III wiretap (573) 424-4464	Brian Lord, Thomas Anderson David Dodge &	DEA SA Brandon Moles

¹The listing of a potential witness or witnesses is not meant to be all-inclusive. As the date set for hearings approaches, the Government may add, substitute or delete witnesses for various reasons.

DATE	EVENT/ITEM	DEFENDANT(S)	WITNESS
		Brian Hounsom	
June 28, 2012	Title III wiretap (573) 424-4464 (Amended application & order)	Brian Lord, Thomas Anderson David Dodge & Brian Hounsom	DEA SA Brandon Moles
July 13, 2012	Title III wiretap (573) 424-4464 (Continuance application & order)	Brian Lord, Thomas Anderson David Dodge & Brian Hounsom	DEA SA Brandon Moles
Sept. 28, 2012	Title III wiretap (314) 960-5433	Thomas Anderson Brian Hounsom Nicholas Johnston & Brian Lord	DEA SA Brandon Moles
Oct. 26, 2013	Non-custodial statements and seizures of aircraft & \$946,900.00.	Travis Champ	DEA SA Carl Rideout Boston, MA
Nov. 6, 2013	Search Warrant: 1966 Tarmac Road Redding, CA	Joseph Natale	DEA SA Dennis Hale Sacramento, CA
Nov. 8, 2013	Non-custodial statements	Travis Champ	DEA SA Brandon Moles
July 16, 2012	Non-custodial statements & seizure of \$35,490.00 at Lambert Airport	Brian Lord	DEA SA Arnie Baratti
June 18, 2014	Consensually recorded telephone conversations	Brian Lord Thomas Anderson David Dodge	DEA SA Brandon Moles

As additional evidence is found, and as supplemental information comes to the government's attention, the government may choose not to use some evidence described, or to use evidence additional to that listed in these reports. If the government chooses to use additional evidence, a supplemental Rule 12(b)(4) notice, and/or a Notice of Intent to Seek the Admission of Evidence Pursuant to Federal Rule of Criminal Procedure 404(b) will be filed.

Respectfully submitted,

RICHARD G. CALLAHAN
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/s/ John T Davis
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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2014, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ John T Davis
JOHN T DAVIS